

EXHIBIT A

SUM-100

SUMMONS

(CITACION JUDICIAL)

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

AMAZON.COM SERVICES, LLC. and DOES 1 through 100, inclusive

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

JENNIFER A. STEBBINS

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): San Francisco Superior Court

400 McAllister Street; San Francisco, CA 94102

CASE NUMBER:
(Número del Caso):

CGC-24-612911

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Charles M. Louderback; Louderback Law Firm; 87 Carnoustie Heights; Novato, CA 94949-7219; (415) 933-0000

DATE:
(Fecha) **03/07/2024**

Clerk, by
(Secretario) **SHENEQUA GLADNEY**, Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☒ on behalf of (specify) Amazon.com Services, LLC
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☒ other (specify): Corp. Code 17701.16, Limited Liability Company
- ☐ by personal delivery on (date):

Page 1 of 1

Charles M Louderback, Esq. (State Bar #88788)
Louderback Law Firm
87 Carnoustie Heights
Novato, CA 94949-7219
Telephone: (415) 933-0000
clouderback@louderbackgroup.com

Attorney for Plaintiff, JENNIFER A. STEBBINS

ELECTRONICALLY

FILED

*Superior Court of California,
County of San Francisco*

03/07/2024

Clerk of the Court

BY: SHENEQUA GLADNEY
Deputy Clerk

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

CITY AND COUNTY OF SAN FRANCISCO

JENNIFER A. STEBBINS,

Plaintiff,

v.

AMAZON.COM SERVICES, LLC. and
DOES 1 through 100, inclusive,

Defendants.

Case No.

CGC-24-612911

**COMPLAINT FOR DAMAGES (AMOUNT
DEMANDED EXCEEDS \$25,000.00)**

1. **AGE DISCRIMINATION;**
2. **FAILURE TO PREVENT AGE
DISCRIMINATION;**
3. **RETALIATION;**
4. **CONSTRUCTIVE DISCHARGE**

JURY TRIAL DEMANDED

Plaintiff, Jennifer A. Stebbins hereby alleges against Amazon.com Services, LLC
(hereinafter "Amazon"), and Does 1 through 100 inclusive as follows:

PARTIES

1. Plaintiff, Jennifer A. Stebbins, was an employee of Amazon for approximately four years 10/15/2019 to 8/18/23. Amazon is a large international corporation which has offices throughout the United States. Plaintiff worked in one of Amazon's many San Francisco offices.
2. The true names, identities, or capacities, whether individual, corporate, associate or otherwise of defendants, those 1 through 100, inclusive, are unknown to Plaintiff who, therefore, sues said defendants by such fictitious names. When their true names, identities, or capacities of

1 such fictitious designated defendants are ascertained, Plaintiff will ask leave of this Court to
2 amend the Complaint to insert said true names, identities, and capacities together with the proper
3 charging allegations.

4 3. Plaintiff is informed and believes, and thereon alleges, that each of the defendants sued
5 herein as Does 1 through 100 are responsible in some manner and liable herein for negligent,
6 wanton, reckless, tortious conduct, and strict liability and by such wrongful conduct, proximately
7 caused the plaintiffs injuries and damages.

8 **JURISDICTION AND VENUE**

9 4. This Court has personal jurisdiction over the defendants because they are residents of
10 California, have contact with, and are doing business in the state of California.

11 5. Venue is proper in this county and judicial district in accordance with CCP sections 394
12 and 395 because some or all of the defendants do business in this judicial district, and Plaintiff
13 and others employed by defendants did business and had substantial contact in this county and
14 judicial District.

15 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

16 6) Plaintiff filed timely charges of age discrimination and retaliation with the Department of
17 Fair Employment and Housing.

18 **FACTUAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

19 7. Plaintiff is a 59-year-old female, who, by any objective measure, enjoyed a stellar career
20 with Amazon. She was an outstanding researcher and respected by all her peers. Plaintiff received
21 four consistently good annual performance reviews, indicated as "high performance", three of
22 which were given by her most recent manager, which was among the highest level possible.

23 8. During her entire employment at Amazon, Plaintiff never received a poor work review
24 until such time as she complained of age discrimination by her supervisor and was put on a
25 performance improvement plan.

26 **FIRST CAUSE OF ACTION**

27 **VIOLATION OF CALIFORNIA'S FAIR EMPLOYMENT AND HOUSING ACT: AGE DISCRIMINATION AGAINST DEFENDANT AMAZON AND DOES 1 THROUGH 100.**

28 9. As a first, separate and distinct cause of action, Plaintiff complains against defendant

1 Amazon and Does 1 through 100 inclusive and realleges all the allegations contained in the
2 complaint and incorporates them by reference into this cause of action as if fully set forth herein.

3 10. Defendant Amazon is a covered employer under California's Fair Employment and
4 Housing Act. Plaintiff was a covered employee under the age discrimination provisions of the
5 Fair Employment and Housing Act being 59 years of age or older and was a qualified employee
6 for the positions she held.

7 11. Plaintiff was subjected to adverse employment action in the form of differential treatment,
8 denial of requests and benefits that were enjoyed by significantly younger employees at Amazon.
9 Unlike employees who were substantially younger than her, plaintiff was set up to fail by her
10 supervisor. In particular, plaintiff was denied the opportunity to make high-visibility oral
11 presentations that are typical of senior members of a research team. This task was important both
12 to her professional work, but also for maintaining her work reputation **as a senior, more**
13 **experienced member of the team and to support her promotion to level 7.** Rather, a
14 significantly younger employee, roughly 20 years her junior, was given this opportunity on many
15 occasions to make presentations, even though the plaintiff was more qualified to make the
16 presentation.

17 12. Plaintiff approached her supervisor **on no fewer than 5 separate occasions over the**
18 **course of a year requesting opportunities to present so she can be viewed as a more senior**
19 **person on the team. After she was passed over yet again in early May 2023, she** suggested
20 some ageism was involved, **however** her supervisor mocked her and dismissed her concerns.
21 Plaintiff's supervisor never allowed plaintiff to do a number of oral presentations even though
22 plaintiff was a highly qualified presenter who did the work being presented. However, she gave
23 an employee, in her early to mid 30s, the opportunity to make all of the high visibility oral
24 presentations.

25 13. In doing the acts alleged herein, Amazon proceeded intentionally, oppressively and
26 maliciously toward plaintiff with advance, knowledge, conscious disregard of the rights, or the
27 consequence to plaintiff, with the intent of depriving plaintiff of property legal rights, and
28 otherwise causing plaintiff injury. Because the acts toward plaintiff were carried out by

1 managerial employees in a deliberate, retaliatory, cold, callous and intentional manner in order to
2 injure and damage, plaintiff requests the assessment of punitive damages, pursuant to California
3 Civil Code, section 3294.

4 14. As a proximate result of the foregoing conduct by Amazon, which violated the provisions
5 of Government Code section 12940, and 12941 et seq., Plaintiff has been forced to incur
6 attorney's fees and costs in the prosecution of this claim, in an amount to be approved at trial.

7 15. Wherefore, plaintiff requests relief as hereinafter provided.

8 **SECOND CAUSE OF ACTION**
9 **FAILURE TO PREVENT AGE DISCRIMINATION AGAINST DEFENDANT AMAZON**
10 **AND DOES 1 THROUGH 100**

11 16. As a second, separate, and distinct cause of action, plaintiff complains against defendant
12 Amazon and Does 1 through 100, inclusive, and realleges all the allegations contained in the
13 complaint and incorporates them by reference into this cause of action as though fully set forth
14 herein.

15 17. Amazon knew, or should have known, that its employees were engaging in age
16 discrimination against Plaintiff but failed to prevent it. In fact, Amazon engaged in a purposeful
17 plan to make the plaintiff's work life so miserable and oppressive that she would quit her job at
18 Amazon. Amazon ignored the age discrimination against Plaintiff as part of its scheme to harass
19 and intimidate plaintiff.

20 18. Such failure by defendant Amazon constituted unlawful employment discrimination and
21 was a substantial factor in causing damage and injury to Plaintiff has set forth below.

22 19. As a direct and proximate result of the affirmative acts and omissions of Amazon, Plaintiff
23 has suffered and continues to suffer emotional distress, fear, worry, loss, diminished self-worth
24 and general and compensatory damages, including but not limited to substantial losses to
25 earnings, income, bonuses, medical and other benefits, which Plaintiff had a right to, and would
26 have received in the future had Amazon not caused the above described injury to Plaintiff's rights
27 and person. Plaintiff's damages for those injuries which exceed the jurisdiction of the limits of
28 this court and will be established according to proof at trial.

20. As a direct and proximate result of the aforementioned acts and omissions of Amazon,

1 plaintiff has been caused to suffer and will continue to suffer in the future, humiliation, anxiety,
2 severe emotional distress, worry, fear, personal, physical and bodily injury and damages, all to his
3 special and general damage according to proof at the time of trial.

4 21. The foregoing conduct engaged in by Amazon and Does 1 through 100, and each of their
5 directors, officers and/or managing agents, constitutes malice, fraud and oppression. and was
6 carried on with a conscious and willful disregard of plaintiff's rights including her right to work
7 in an environment free of discrimination based on her age so as to entitle plaintiff to punitive
8 damages to set an example of Amazon and Does 1 through 100.

9 22. All actions of Amazon, its employees and agents as herein alleged, were authorized,
10 ratified and approved by the officers or managing agents of Defendant Amazon and 1 through
11 100. Therefore, plaintiff is entitled to punitive or exemplary damages against the defendant
12 employer and Does 1 through 100 in an amount to be determined at the time of trial.

13 23. As a proximate result of the foregoing conduct, which violated provisions of Government
14 Code Sections 120940 and section 120941, et seq., Plaintiff has been forced to incur attorney's
15 fees and costs in the prosecution of this action, in an amount to be determined through the trial
16 and/or in after trial motions.

17 24. Wherefore, plaintiff requests relief as herein provided.

18 **THIRD CAUSE OF ACTION**
19 **CLAIM OF RETALIATION AGAINST DEFENDANT AMAZON AND DOES 1**
20 **THROUGH 100.**

21 25. As a third, separate and distinct cause of action, plaintiff complains against all defendants,
22 including but not limited to, Amazon, and Does 1 through 100 inclusive, and realleges all the
23 allegations contained in the complaint, and incorporates them by reference into this cause of
24 action as though fully set forth herein.

25 26. Amazon is a covered employer under California's Fair Employment and Housing Act.
26 Plaintiff was a covered employee under this Act. One area under the Act, where plaintiff was
27 protected, included being able to identify and complain about age discrimination if she perceived
28 that it was happening.

27 27. After plaintiff complained about ageist comments and activity by Amazon, Amazon and

its employees engaged in fabrications of plaintiffs alleged substandard work performance and punished her by forcing her to undergo a demeaning and humiliating performance improvement plan without any justification that would preclude her from participating in any high visibility oral presentations.

28. These aforementioned acts were committed with malice, fraud and oppression by management of Amazon intended to harm plaintiff and justify the imposition of punitive damages. These decisions and actions set forth herein were a substantial factor in causing damages to plaintiff including monetary damages, special damages, and general damages.

FOURTH CAUSE OF ACTION

CONSTRUCTIVE DISCHARGE

29. As a fourth, separate and distinct cause of action, plaintiff complains against Amazon, and Does1 through 100 inclusive, and all previous allegations contained in the complaint are incorporated by reference into this cause of action, as fully set forth herein.

30. The actions of Amazon, as fully set forth in this complaint, made the work atmosphere so intolerable that no reasonable person would stay at that workplace. As a result of the harassment, intimidation, age discrimination, and retaliation by Amazon, plaintiff was forced to leave Amazon's employment.

31. In doing the acts alleged herein, Amazon proceeded intentionally, oppressively, fraudulently and maliciously toward plaintiff with advance knowledge, conscious disregard of the rights, or the consequence to plaintiff, within the intent of depriving plaintiff of property and legal rights and otherwise causing plaintiff injury. Because the acts toward plaintiff were carried out by managerial employees in a deliberate, cold, callous and intentional manner in order to injure and damage plaintiff, plaintiff requests the assessment of punitive damages pursuant to California Civil Code section 3294.

PRAYER

Wherefore, plaintiff prays judgment against defendant Amazon, and each of them, as follows:

1. For general and special damages according to proof;
2. For loss of earnings and earning capacity, according to proof;

3. For prejudgment interest to the extent allowed by law;
4. For cost of suit incurred herein;
5. For punitive and/or exemplary damages in an amount to punish defendant;
6. For attorney's fees in prosecuting this action; and
7. For such other and further relief as the court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands trial by jury on all issues as triable in the complaint.

Dated: March 7, 2024

LOUDERBACK LAW FIRM


CHARLES M. LOUDERBACK

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Charles M Louderback, Esq. (State Bar #88788) Louderback Law Firm; 87 Carnoustie Heights; Novato, CA 94949-7219		FOR COURT USE ONLY ELECTRONICALLY FILED <i>Superior Court of California,</i> <i>County of San Francisco</i> 03/07/2024 Clerk of the Court BY: SHENEQUA GLADNEY Deputy Clerk	
TELEPHONE NO.: 415-933-0000 FAX NO.: EMAIL ADDRESS: clouderback@louderbackgroup.com ATTORNEY FOR (Name): Plaintiff Jennifer A Stebbins			
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO STREET ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND ZIP CODE: San Francisco, CA 94102 BRANCH NAME: Civic Center Courthouse			
CASE NAME: Jennifer A. Stebbins v. Amazon.com Services, LLC			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$35,000) <input type="checkbox"/> Limited (Amount demanded is \$35,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: CGC-24-612911 JUDGE: DEPT.:

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (<i>not specified above</i>) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (<i>not specified above</i>) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses
e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
|--|--|
3. Remedies sought (*check all that apply*): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (*specify*): 4; Age Discrimination; Retaliation; Constructive Discharge; Failure to Prevent Discrimination
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (*You may use form CM-015.*)
- Date: March 7, 2024
 Charles M. Louderback

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE	
<ul style="list-style-type: none"> Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions. File this cover sheet in addition to any cover sheet required by local court rule. If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding. Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only. 	

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET**CM-010**

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES**Auto Tort**

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death

Product Liability (*not asbestos or toxic/environmental*) (24)

Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons

Other Professional Health Care Malpractice

Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)

Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)

Intentional Infliction of Emotional Distress

Negligent Infliction of Emotional Distress

Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)

Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)

Defamation (e.g., slander, libel) (13)
Fraud (16)

Intellectual Property (19)
Professional Negligence (25)

Legal Malpractice
Other Professional Malpractice (*not medical or legal*)

Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)

Other Employment (15)

Contract

Breach of Contract/Warranty (06)

Breach of Rental/Lease

Contract (*not unlawful detainer or wrongful eviction*)

Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)

Negligent Breach of Contract/Warranty

Other Breach of Contract/Warranty

Collections (e.g., money owed, open book accounts) (09)

Collection Case—Seller Plaintiff

Other Promissory Note/Collections Case

Insurance Coverage (*not provisionally complex*) (18)

Auto Subrogation

Other Coverage

Other Contract (37)

Contractual Fraud

Other Contract Dispute

Real Property

Eminent Domain/Inverse

Condemnation (14)

Wrongful Eviction (33)

Other Real Property (e.g., quiet title) (26)

Writ of Possession of Real Property

Mortgage Foreclosure

Quiet Title

Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)

Residential (32)

Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)

Petition Re: Arbitration Award (11)

Writ of Mandate (02)

Writ—Administrative Mandamus

Writ—Mandamus on Limited Court Case Matter

Writ—Other Limited Court Case Review

Other Judicial Review (39)

Review of Health Officer Order

Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)

Construction Defect (10)

Claims Involving Mass Tort (40)

Securities Litigation (28)

Environmental/Toxic Tort (30)

Insurance Coverage Claims

(*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)

Abstract of Judgment (Out of County)

Confession of Judgment (*non-domestic relations*)

Sister State Judgment

Administrative Agency Award (*not unpaid taxes*)

Petition/Certification of Entry of Judgment on Unpaid Taxes

Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)

Other Complaint (*not specified above*) (42)

Declaratory Relief Only

Injunctive Relief Only (*non-harassment*)

Mechanics Lien

Other Commercial Complaint

Case (*non-tort/non-complex*)

Other Civil Complaint

(*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate

Governance (21)

Other Petition (*not specified above*) (43)

Civil Harassment

Workplace Violence

Elder/Dependent Adult Abuse

Election Contest

Petition for Name Change

Petition for Relief From Late Claim

Other Civil Petition